

FILED
U.S. DISTRICT COURT
BALTIMORE, MARYLAND

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April 4, 2002

Via HAND DELIVERY

Honorable Marvin J. Garbis
United States District Judge
United States District Court
for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

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APR 16 2002

AT BALTIMORE
CLERK U.S. DISTRICT COURT
DISTRICT OF MARYLAND

BY

RECEIVED
IN THE CHAMBERS OF
MARVIN J. GARBIS

APR 05 2002

UNITED STATES DISTRICT COURT

Re: ***Laurie J. Poss v. UNUM Life Insurance Company of America***
Civil Action No. MJG 01 CV 3279

Dear Judge Garbis:

After discussions between counsel which could not resolve discovery disputes, the Plaintiff has served her Motion to Compel Discovery. This Motion raises issue which will have a major impact on the resolution of this case, and the Defendant seeks an extension of time within which to respond to that Motion until April 24, 2002.

The Plaintiff agrees with that extension provided the parties are given adequate time to conduct any discovery which the Court permits in its ruling on the Motion to Compel. Since the present Scheduling Order requires the conclusion of discovery on June 1, 2002, the parties therefore request that the Scheduling Order to be amended to provide that the June 1 discovery deadline be set aside so that after the ruling on the Motion to Compel Discovery the parties may consult and provide the Court with a proposed time for completion of any discovery permitted by the Court.

Therefore, we jointly request that the Court:

1.) Approve the extension of time for the Defendant to respond to the Plaintiff's Motion to Compel Discovery, and

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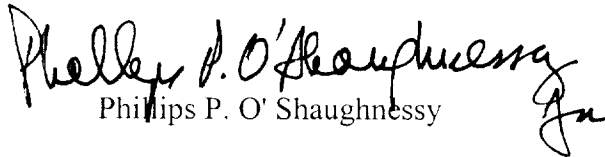
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2.) Amend the Scheduling Order in this case to permit the parties to consult after the Court's ruling on the Motion to Compel and propose to the Court a proposed time for completion of any discovery permitted by the Court in that ruling.

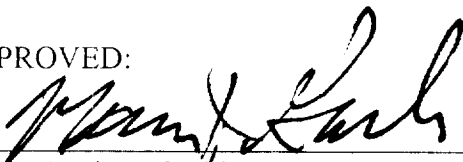
Thank you very much.

Very truly yours,


Philip P. O' Shaughnessy


J. Snowden Stanley, Jr.

APPROVED:


Hon. Marvin J. Garbis
United States District Court Judge

Date: 